

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

1:18-CV-24227-CMA-Altonaga

JASON MILLER,)
)
Plaintiff,)
)
vs.)
)
GIZMODO MEDIA GROUP, LLC,)
a Delaware Corporation, KATHERINE)
KRUEGER, individually, and WILL)
MENAKER, individually,)
)
Defendants.)

**UNOPPOSED MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Katherine M. Bolger of the law firm of Davis Wright Tremaine LLP, 1251 Avenue of the Americas, 21st Floor, New York, New York 10020, (212) 489-8230, for purposes of appearance as co-counsel on behalf of defendants Gizmodo Media Group, LLC and Katherine Krueger in the above-styled case only, and pursuant to Section 2B of the CM/ECF Administrative Procedures, to permit Katherine Bolger to receive electronic filings in this case, and in support thereof states as follows:

1. Katherine Bolger is not admitted to practice in the Southern District of Florida and is a member in good standing of the bar of the State of New York. Attached hereto is a certificate of good standing from the Clerk of the Appellate Division of the New York Supreme Court, First Department.

2. Movant, Deanna K. Shullman, Esquire, of the law firm of Shullman Fugate PLLC, 2101 Vista Parkway, Suite 4006, West Palm Beach, Florida 33411, (561) 429-3619, is a member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida, maintains an office in this State for the practice of law, and is authorized to file through the Court's electronic filing system. Movant consents to be designated as the member of the Bar of this Court with whom opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Katherine Bolger has made payment of this Court's \$75.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Katherine Bolger, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Katherine Bolger at the e-mail address: katebolger@dwt.com.

WHEREFORE, Deanna K. Shullman moves this Court to enter an Order for Katherine Bolger to appear before this Court on behalf of defendants Gizmodo Media Group, LLC and Katherine Krueger, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Katherine Bolger.

Date: December 10, 2018

Respectfully submitted,
/s/ Deanna K. Shullman
Deanna K. Shullman
Florida Bar No. 0514462
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*Attorneys for Defendants Gizmodo Media Group
LLC and Katherine Krueger*


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CERTIFICATION OF KATHERINE M. BOLGER

Katherine Bolger, Esquire, pursuant to Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys, hereby certifies that (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; and (2) I am a member in good standing of the State of New York Bar.



Katherine M. Bolger

Case No. 1:18-cv-24227-CMA

CERTIFICATION PURSUANT TO S.D. FLA. L.R. 7.1(a)(3)

Defendants' undersigned counsel, Deanna K. Shullman, hereby certifies that counsel for Defendants has conferred with counsel for Plaintiff and they have consented to the filing of this motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Appear *Pro Hac Vice*, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filings was served by CM/ECF on December 10, 2018 on all counsel or parties of record on the service list.

/s/ Deanna K. Shullman
Deanna K. Shullman

Case No. 1:18-cv-24227-CMA

SERVICE LIST

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**Appellate Division of the Supreme Court
of the State of New York
First Judicial Department**

I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

KATHERINE MARY BOLGER

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on May 24, 1999, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my
hand and affixed the seal of this court on

December 4, 2018



Clerk of the Court

UNITED STATES DISTRICT COURT
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**[PROPOSED] ORDER GRANTING MOTION TO APPEAR
PRO HAC VICE, CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

THIS CAUSE having come before the Court on the Motion to Appear *Pro Hac Vice*, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Katherine Bolger (the “Motion”), pursuant to the Special Rules Governing the Admission and Practice of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures. This Court having considered the motion and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED. Katherine Bolger may appear and participate in this action on behalf of defendants Gizmodo Media Group, LLC and Katherine Krueger. The Clerk shall provide electronic notification of all electronic filings to Katherine Bolger at katebolger@dwt.com.

DONE AND ORDERED in Chambers at _____, Florida, this
____ day of _____, 2018.

Hon. Cecilia Altonaga
United States District Judge

Copies furnished to:
All Counsel of Records